

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED NATIONAL INSURANCE COMPANY,

Plaintiff,

Docket No.: 07-CV-10303
(PAC)

-against-

NOTICE OF MOTION

BLANDFORD CONSTRUCTION CORP.,
CHRISTOPHER LICKMAN, and KEN LICKMAN

Defendants.

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PLEASE TAKE NOTICE, that upon the annexed Affirmation of Adam I. Kleinberg, dated January 30, 2008, and upon all prior pleadings and proceedings, the undersigned will move this Court before the Honorable Paul A. Crotty, on a date and time to be designated by the Court, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York 10007, for an order granting plaintiff, UNITED NATIONAL INSURANCE COMPANY, a default judgment as against defendants BLANDFORD CONSTRUCTION CORP., CHRISTOPHER LICKMAN, and KEN LICKMAN, pursuant to Rule 55 of the Federal Rules of Civil Procedure, declaring that UNITED NATIONAL INSURANCE COMPANY is not obligated to defend or indemnify defendants BLANDFORD CONSTRUCTION CORP., CHRISTOPHER LICKMAN, and KEN LICKMAN in the action entitled *152 Wooster Street Corp. vs. Tribeach Holding, LLC, 160 Wooster Street, LLC, Flintlock Construction Services, LLC, Blandford Construction Corp., and Thomas O'Hara Architects, PLLC*, Index Number 106005/06, in the Supreme Court of the State of New York, New York County, on the ground that they have failed to timely answer and/or otherwise move with respect to the complaint in this action, and for such other and further relief as this Court

deems just, equitable, and proper.

Dated: Mineola, New York
January 30, 2008

MIRANDA SOKOLOFF SAMBURSKY
SLONE VERVENIOTIS LLP
Attorneys for Plaintiff
**UNITED NATIONAL
INSURANCE COMPANY**

By: 

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